# FINAL

# ENVIRONMENTAL IMPACT REPORT

An Addendum to the Draft
Environmental Impact Report

Grizzly Peak Estates
ER 79-23

City of Oakland

May, 1980

File No. Tract 4565
Ref. No. ER 79-23

City of Oakland
Oakland, California

FINAL ENVIRONMENTAL IMPACT REPORT FOR:

Grizzly Peaks Estates Subdivision
(Project Title)

California Environmental Quality Act

CERTIFICATION OF COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The Director of City Planning finds that the attached Final Environmental Impact Report has been completed in compliance with the California Environmental Quality Act, the Guidelines prescribed by the Secretary for Resources, and the provisions of the City of Oakland's Statement of Objectives, Criteria and Procedures for Implementation of the California Environmental Quality Act.

Norman J. Lind

NORMAN J. LIND
Director of City Planning

Date: May 7, 1980

ACCEPTANCE OF FINAL REPORT BY CITY PLANNING COMMISSION

The attached Final Environmental Impact Report was accepted by the Oakland City Planning Commission at its meeting of May 14, 1980.

Marc Herbert

MARC HERBERT, Secretary
City Planning Commission

Attach to Final Environmental Impact Report.

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## PREFACE TO ADDENDUM

A. The Draft Environmental Impact Report (DEIR) on the proposed Grizzly Peak Estates subdivision was prepared in November, 1979, and a public hearing on the project and the DEIR was held by the Oakland Planning Commission on April 9, 1980.

B. After the hearing, in response to comments on the project and the DEIR, the applicant revised the subdivision Tentative Map, reducing the number of proposed lots from 19 to 16 and providing a new street system and lot configurations. (See revised map on following page.)

C. The purposes of this document are the following:

1. To provide responses to comments on the DEIR, including those made in writing by citizens and public agencies and those made during public testimony at the April 9 public hearing;

2. To provide revised EIR information in response to the revised Tentative Map.

D. As of this writing, the next scheduled public meeting on the EIR and the project is May 14, 1980. At that meeting, if the City Planning Commission makes the finding that the Addendum provides satisfactory responses to comments on the DEIR, consistent with the requirements of the California Environmental Quality Act, the Commission may certify (approve) the project EIR.

## ADDENDUM FORMAT

A. This document has been prepared in compliance with the provisions of Section 15146 (Contents of Final Environmental Impact Report) of the State EIR Guidelines (Title 17, California Administrative Code, Section 14).

B. As permitted by the State Guidelines, and to simplify understanding of the Addendum, some of the comments on the DEIR have been generally grouped and summarized by category of environmental concern.

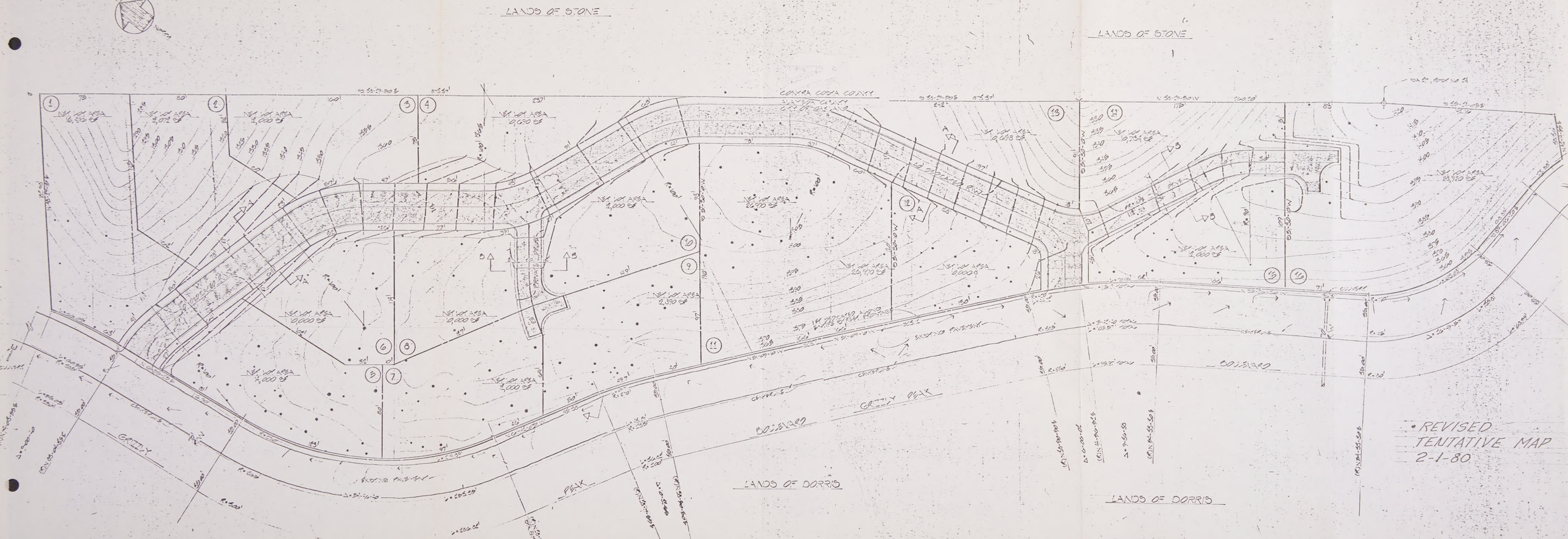
C. Copies of letters of comment are contained in the Addendum appendices.

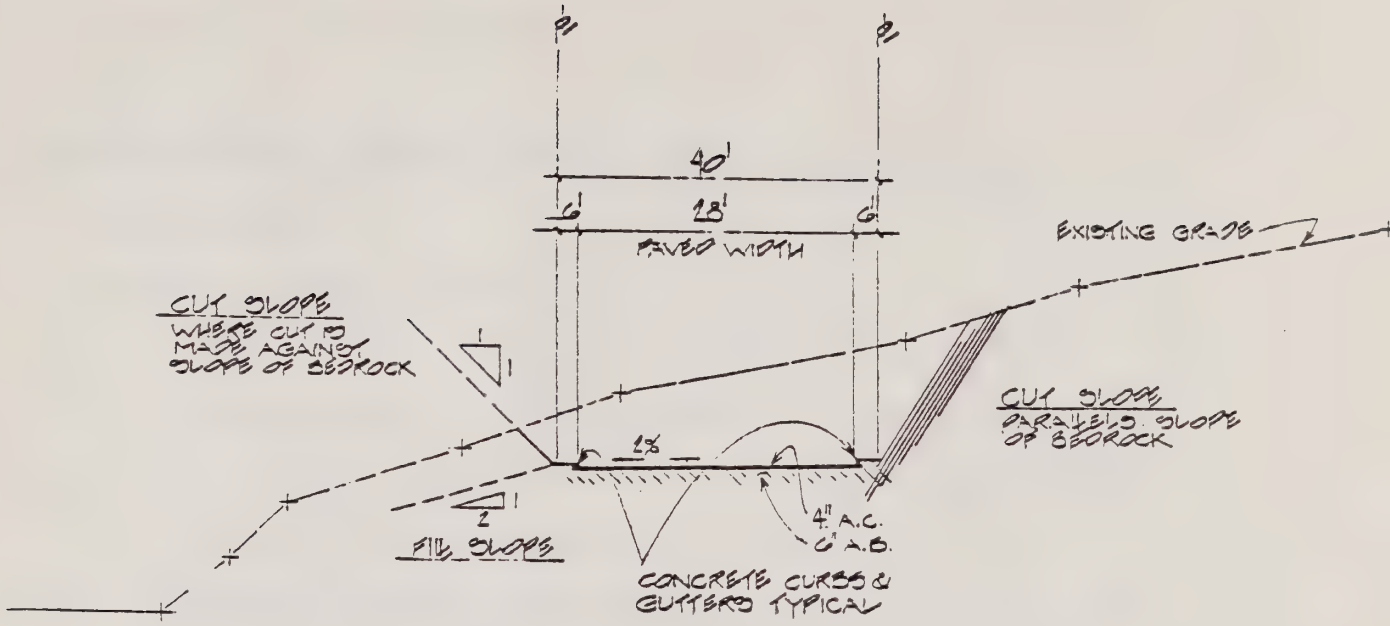
D. The minutes of the April 9 project and DEIR public hearing are contained in the City's records of Planning Commission proceedings, available at the Planning Department office.

## MAJOR AREAS OF CONCERN

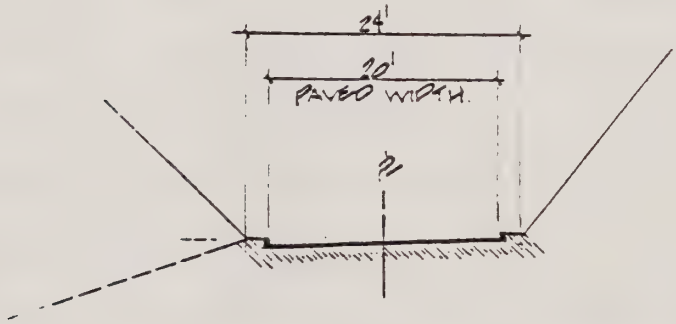
Based on comments on the DEIR, the primary areas of environmental concern appear to fall into the following descending order:

A. Fire safety and related water supply;


LANDS OF STONE
LANDS OF STONE
CONTRA COSTA COUNTY
GRIZZLY PEAK
GRIZZLY PEAK
LANDS OF DORRIS
LANDS OF DORRIS
REVISED
TENTATIVE MAP
2-1-80




SECTION A-A
40' DEDICATED RIGHT OF WAY
NTS.




SECTION B-B
24' RIGHT OF WAY
ALL NOTES SIMILAR TO SECTION A-A

REVISED STREET CROSS SECTIONS
(See revised Tentative Map)

No Scale

B. Adequacy of circulation and parking;

C. Grading and erosion potential;

D. Other.

LIST OF PERSONS AND AGENCIES COMMENTING ON THE PROJECT DRAFT EIR

I. Written Comments

A. Public Agencies (Appendix A)

1. Alameda County Public Works Agency (1-23-80)

2. East Bay Municipal Utility District (10-24-79 and 1-21-80)

3. Department of Transportation, State of California (1-8-80)

4. Public Works, City of Oakland (1-22-80)

B. Citizens and Citizen Organizations (Appendix B)

1. A. W. Baxter, 6823 Buckingham Blvd., Berkeley (2-26-80)

2. May Blos, 29 Live Oak Rd., Berkeley (1-21-80)

3. Elizabeth Moss, 6890 Charing Cross Rd., Berkeley (1-19-80)

4. Save The Hills Association (1-18-80 and 2-21-80)

5. The Orinda Association (4-9-80)

6. Citizens for Urban Wilderness Areas (3-5-80)

II. Verbal Comments at April 9 Hearing

Roger Reeve (representing Citizens for Urban Wilderness Areas)

REVISED EIR INFORMATION BASED ON REVISED PROJECT TENTATIVE MAP

In general, the revised project Tentative Map shown on the preceding pages indicates a subdivision with reduced environmental impacts over those found for the previous (original) proposal (see previous Tentative Map in DEIR).

The revised project eliminates the previously-proposed tennis court, substantially reduces subdivision earthwork, provides a wider main roadway and curbs and gutters for streets, eliminates one street intersection with Grizzly Peak Blvd., reduces the number of residential lots, and decreases the visual impact of the subdivision improvements as seen from Grizzly Peak Blvd.

Specific differences between the previously- and currently-proposed subdivisions are discussed on the following page.

| | Previous Proposal | Current Proposal |
|---|---|---|
| Number of lots | 19 | 16 |
| Gross Density | 2.65 units/acre (0.38 acre/unit) | 2.23 units/acre (0.45 acre/unit) |
| Net Density | 3.68 units/acre (0.23 unit/acre) | 2.55 units/acre (0.39 unit/acre) |
| Range of Lot Sizes | 10,000 to 21,570 sq. ft. | 10,000 to 28,920 sq. ft. |
| Utilities in General | | Less service needed |
| Water Supply Requirement (Reclassified water from Hilltop Reservoir) | 9,100 gal./day | 7,000 gal./day |
| Project Traffic Generation (at 16 trips/day/unit) | 304 trips/day | 256 trips/day |
| Earthwork Volume (for subdivision streets) | 2,225 cubic yards (some export required) | 500 cubic yards (balanced) (no tennis court) |
| Vegetation (number of trees to be removed for street improvements) | Approximately 38 | Approximately 46 |
| Noise | | Noise generation somewhat reduced by fewer residents and vehicle trips |
| Energy | | Energy consumption reduced by fewer households and vehicle trips |
| Air Quality | | Less pollution from fewer households and vehicle trips |
| Schools (total number of project students) | 10 | 8 |
| Archaeology | No known impact | No known impact |
| Public Services Demand | | Somewhat less |

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (p. 1, 1st and 2nd Paragraphs) |

2. Public Testimony on:

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Comment: "...we are disappointed that the District's complete Environmental Assessment* was not appended to the Draft EIR. You reproduced selected portions of it on pages B-4 through B-7, without identifying it as to source or date. Enclosed with this letter is another copy of that Environmental Assessment, which we ask you to include in the Final EIR, along with this letter, as the District's official comments on the City's Draft EIR.

"As you know, the 'project' covered by EBMUD's Environmental Assessment is the action of the EBMUD Board of Directors to provide storage capacity for extension of water service in the Hilltop Pressure Zone if the proposed Grizzly Peak Estates

* East Bay Municipal Utility District, Oct., 1979, Draft Environmental Assessment for Extension of Water Service in Hilltop Pressure Zone, Including Removal of Special Classification of Related Distribution Facilities

subdivision is approved by the City. In particular, it is the removal of the special classification of Hilltop Reservoir and Pumping Plant to make those facilities part of the regular distribution system."

Responses: 1. As Lead Agency for preparation of the project EIR, the City has defined the project as 1) the proposed subdivision and 2) reclassification of only enough Hilltop Reservoir capacity to provide water service to the subdivision.

2. EBMUD's Assessment (referenced on preceeding page) is addressed to reclassification of the total capacity of the Hilltop Reservoir. EBMUD has defined this reclassification as "the project". Thus, the subject of EBMUD's document is different from the City's designated project, even though the document considers partial reclassification as an alternative to "the project", and rejects the alternative.

3. The EBMUD Assessment was reviewed by the City and found to contain information useful in addressing the subject of water supply in the project area, and this information was included in Appendix B of the DEIR as follows:

a. Sections D and E, pages 6 and 7 of the Assessment ("Service Capacity of Hilltop Reservoir" and "Service Capacity of Hilltop Pumping Plant") are contained on page B-4, Appendix B, DEIR;

b. Section B, pages 11, 12, and 13 of the Assessment ("The Fire Hazard") are contained on page B-5, Appendix B, DEIR;

c. Section C, pages 13 and 14 of the Assessment ("Growth Related Considerations") is contained on page B-6, Appendix B, DEIR;

d. Section E, pages 15 and 16 of the Assessment ("Impact of Removing the Special Classification") is contained on page B-6, Appendix B, DEIR;

e. Section F, page 16 of the Assessment ("Related Special Classifications") is contained on page B-7, Appendix B, DEIR.

4. The entire EBMUD Assessment has not been included in the EIR because its subject ("the project", as defined by EBMUD) is beyond the scope of the project EIR.

5. EBMUD's letter of comment on the DEIR, dated January 21, 1980, is contained in the appendices of this document.

6. Copies of the EBMUD Assessment are available for public review at the City Planning Department office and at the EBMUD office at 2130 Adeline St., Oakland.

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (p. 1, 3rd paragraph) |

2. Public Testimony on:

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Comment: "The City's Draft EIR describes the project water supply as including only partial removal of the special classification (last paragraph on p. 7). EBMUD's Environmental Assessment describes this approach as one alternative. Partial removal for Grizzly Peak Estates would mean that there would have to be subsequent partial removals of the special classification when the City approves other new subdivisions or when it issues building permits for individual new homes. It is unclear what benefit this would achieve. In effect, this extra administrative procedure would not make water service conditions any different than if the special classification is completely removed."

Response: With the continuation of the procedure of reclassifying Hilltop Reservoir water capacity for each new City development approval in the hill area, it is true that EBMUD's administrative procedures would have to be repeated. Such repetition, however, would not be expected to result in significant environmental impact. The City's position is that periodic partial reclassifications rather than one total reclassification would tend to enhance orderly development of the hill area, to the benefit of the community.

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 |

2. Public Testimony on:

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Comment: (p. 2, 2nd paragraph) "Complete removal of the special classification of the Hilltop facilities is not listed in the alternatives section of the City Draft EIR (pp. 49-51). However, an EBMUD decision to remove the special classification for more than just the Grizzly Peak Estates development is discussed in the City's Draft EIR as part of the decision-making options for the project area (pp. 46-48). Parenthetical statements indicate that such an EBMUD decision would be expected to require, or would require, environmental review (Options 3 and 4 on p. 47). It is unclear what procedural process this is suggesting and why it would be necessary, considering the discussion of maximum development and complete removal of the special classification that is contained in the City's Draft EIR."

(p. 4, last paragraph) "On page 47, several decision-making options are described. Options 3 and 4 indicate that an EBMUD decision to remove special classification for more than the Grizzly Peak Estates development would be expected to require, or would require, environmental review. As stated earlier in this letter, it is unclear what procedural process this is suggesting and why it would be necessary."

(p. 5, first paragraph) "Option 4 would continue the special classification for the 180,000 gallons needed for fire fighting reserve. This would be a meaningless and unnecessary action. The special classification should be completely removed under this option."

Responses: 1. The proposed project would not require the complete reclassification of Hilltop Reservoir capacity and the project, as defined by the City, does not include such a reclassification.

2. The discussion of decision-making options in the DEIR is intended only to place the important issue of project water supply in perspective by generally describing optional procedures the City could use in processing the project application. These options include the procedure selected by the City in defining the project, which includes the proposed subdivision and reclassification of only enough Hilltop Reservoir water to serve the subdivision.

3. Since the project does not include the reclassification of Hilltop Reservoir capacity beyond that needed to serve the subdivision, such reclassification would be subject to later action by EBMUD as a separate project requiring separate environmental review. The extent of that review would be determined by the EBMUD Board. The amount of water to be reclassified would be determined by the EBMUD Board.

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (p. 5, 2nd paragraph) |

2. Public Testimony on:

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Comment: "On page 48, under III. Adverse Environmental Effects Which Cannot Be Avoided, 'growth-inducing impact of extension of water ... lines' is listed. The City's Draft EIR points out that the maximum growth in the Hilltop Pressure Zone area 'would result in cumulative adverse impacts but would not be expected to result in significant impacts' (Summary section C.1.g.). The finding that the adverse impacts would not be significant should be made clear in this list of adverse environmental effects. The same revision should be made in the Summary section C.2."

Responses: 1. The DEIR notes that if the proposed water main extension to the project site were built, the estimated number of new dwelling units that could be served--if enough Hilltop Reservoir capacity were reclassified--would be 49 to 76, with 49 the more likely number. This amount of new units would result in cumulative adverse impacts but would not be expected to result in significant impacts.

2. The adverse impact of growth-inducement from extension of the water main and sewer line as proposed, and as listed in the DEIR summary, item C.2.i., and as item III.I., on page 48 of the DEIR, is not considered to be a significant impact.

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (6th paragraph from top of page) |

2. Public Testimony on:

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Comment: (DEIR, p. 37, under II.B.1., Domestic Water) "In the second paragraph, the second and third sentances should be corrected to read '...would require only removal of the special classification of facilities in the Hilltop Pressure Zone. Therefore, this discussion is focused on the potential long-term, indirect impacts of that specific action, and addresses the entire hill area only generally,...'."

Response: Implementation of the proposed project would require 1) extension of the proposed water line and 2) reclassification of enough Hilltop Reservoir water to serve the subdivision.

ENVIRONMENTAL CATEGORY: Water Supply/Hilltop Reservoir Reclassification

Comment Sources (See appendices)

1. Written Comments

| A. Citizens: | Name | Date |
|---|---|---|
| | | |

| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 |
|---|---|---|

2. Public Testimony on:

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Comment: The following comments are from pages 2 and 3 of the January 21, 1980 letter from EBMUD responding to the DEIR. The comments relate to various technical errors in the DEIR's description of the project area water supply and of EBMUD procedures. All of these changes are incorporated into the EIR as recommended by EBMUD.

1. "On page 7, under b. Project Water Supply, the last sentance of the third paragraph should be revised to read '...the EBMUD Board would have to reclassify all or a portion of the remaining 212,000 gallons from emergency to domestic use'."

2. "On page 7a, the first sentance at the top of the page should be corrected to read 'At an estimated maximum water use of 700 gallons/day/unit, and with EBMUD's planning criterion of storage equal to that maximum rate of water use for two days, at least 18,000 gallons would have to be reclassified--about 8.5 percent'."

3. "Also on page 7a, the second paragraph at the top of the page should be clarified by adding 'EBMUD will only consider removal of the special classification if the Final EIR and the Tentative Map for the development project are approved by the City and if the EBMUD Board of Directors certifies the Final EIR as adequate for its proposed action'."

4. "On page 7c, the first 'reason' near the top of the page should be corrected to read 'At least two years would be required for site selection and acquisition, development of conceptual plans, preparation and processing of environmental documentation, and construction'.

"In the second 'reason', 'would result' should be changed to 'may result'. Visual impact of a reservoir can be minimized in a number of ways.

"The parenthetical statement following the third 'reason' should be deleted. It implies that EBMUD would continue to restrict water service from the emergency facilities to control growth. Water service from the emergency facilities has been restricted not to control growth, but to allow the City time to take appropriate actions pursuant to its land use planning authority and responsibility to define, control, or direct the residential development of privately owned lands in the hill area (EBMUD Board Resolution 28309, October 11, 1977). EBMUD does not have legal authority to control growth; such authority has only been granted to cities and counties."

5. "On page 9, in the fourth paragraph, the second sentance should be revised to read '...and EBMUD can supply 1,000 gallons per minute fire flow at a hydrant in accordance with EBMUD standards and as specified by the Fire Department (see Appendices, pp. B-4 and M-1)'."

6. "On page 11, Section 3b should be deleted. Replacements of water facilities throughout the District's distribution system are financed by general funds, not by the existing customers specifically served by those facilities. This area cannot (sic) be treated differently than other areas in the District.

"The footnote to Section 3b is incorrect. The life of the three reservoirs classified as emergency has not been estimated. The District's Environmental Assessment states that 'EBMUD presently has 14 redwood distribution reservoirs in service with an average age of 33 years'."

7. "On page 37, under II.B.1. Domestic Water, the first paragraph should be clarified by adding 'EBMUD may consider complete removal of the special classification of the Hilltop Pressure Zone facilities, in which case subsequent requests for additional reclassification would be unnecessary'."

8. "On page 43, under a. EBMUD, the second sentance should be corrected to read 'EBMUD has also estimated that the potential development in the Hilltop Pressure Zone is 38 new units, considering the rezoning of undivided properties by the City (see p. B-6, Case III estimate)'."

ENVIRONMENTAL CATEGORY: Fire Hazard/Water Supply

Comment Sources (See appendices)

1. Written Comments

A. Citizens:

| Name | Date |
|---|---|
| Elizabeth Moss, 6890 Charring Cross Rd., Berkeley | 1-19-80 |
| Save The Hills Association | 1-18-80<br>2-21-80 |
| May Blos, 7065 Marlborough, Berkeley | 1-21-80 |
| A. W. Baxter, 6823 Buckingham Blvd., Berkeley | 2-26-80 |
| Citizens for Urban Wilderness Areas | 3-5-80 |

B. Agencies or Departments:

2. Public Testimony on: 4-9-80

Roger Reeve (representing Citizens for Urban Wilderness Areas)

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Comment: These citizens and citizen groups have expressed concern about fire hazard in the project area relative to the Hilltop Reservoir water supply and about the potential loss of water supply to the area resulting from major earthquake damage to the EBMUD aqueduct through the Oaklan-Berkeley hills.

Responses: 1. Firefighting service for the project site and firefighting water supply are discussed on pages 9 and 10 of the DEIR, and fire-hazard mitigation alternatives are discussed on page 11. The conclusion of the fire-hazard analysis is that the "...19 units of the proposed project...would not have significant impact on the area's water supply because they would not substantially reduce the total supply available..." (The revised Tentative Map reduces the number of project lots from 19 to 16.)

2. In the DEIR, the need is recognized for a new fire station in the project area to provide firefighting service in conjunction with future development of the area (Section 3.a., p. 11).

3. Water Pressure and Flow: The Oakland Fire Department's standards for the hill area are 1,000 gallons/minute fire hydrant flow with 20 pounds residual pressure, for a period of three hours. EBMUD can supply this flow and pressure for fire hydrants on-site for the required period. Three hours at 1,000 gallons/minute is 180,000 gallons, which is the designated fire-fighting reserve for the Hilltop Reservoir. (See EBMUD discussion of Hilltop Reservoir capacity, Appendix B, page B-4, DEIR.)

4. Hilltop Reservoir Capacity: If the proposed project were approved, the breakdown of Hilltop Reservoir capacity would be as follows:

| | | | |
|---|---|---|---|
| STORAGE: | Reservoir capacity | 250,000 gallons | |
| | Firefighting reserve | 180,000 | |
| | Available domestic water service | 70,000 gallons | |
| DOMESTIC DEMAND: (at maximum of 700 gallons/day/unit) | 21 existing units | 15,000 gallons | |
| | 16 project units | 11,000 | |
| | total demand w/ project | 26,000 gallons | |
| AVAILABLE CAPACITY AFTER PROJECT DEVELOPMENT: | Firefighting reserve | 180,000 gallons | |
| | available domestic capacity | 44,000 | (70,000 - 26,000) |
| | | 224,000 gallons | |

4. Fire Hazard: The Fire Department has indicated that the fire hazard on the project site and in the project area would be decreased if the project were developed as proposed, for the following reasons:*

a. The subdivision roads would be permanent firebreaks;

b. The subdivision roads would improve access to the site;

c. Adequate water supply would be available with on-site fire hydrants. (Currently, the nearest fire hydrants are located at Marlborough Terrace/Grizzly Peak Blvd., about 2,000 feet north of the site, and at the terminus of the Hilltop Reservoir water main, about 3,000 feet south of the site.)

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* Captain Paul F. Bailey, Acting Fire Marshall, Oakland Fire Dept., interview, May 6, 1980

d. Residents of the site would provide early reporting of any fire on or around the site. (As noted in the DEIR, human occupancy of a site tends to increase the potential for fires, and this is recognized by the Fire Department. However, the Department feels that the level of hazard resulting from human occupancy is more than offset by the factors listed above.*)

Estimated response time to the project site for the Fire Department is eight minutes for the first engine company and 12 minutes for a full assignment--two engines, one truck, and one chief.** The Fire Department's opinion is that this is adequate response time--assuming that a fire is reported early. In its undeveloped state, the project site could or the area around it could be subject to a fire that might not be reported for several minutes, thus delaying Fire Department response time beyond the 8 - 10 minutes estimate.

5. Earthquake Damage to EBMUD Aqueduct: The question of the potential for earthquake damage to the EBMUD aqueduct through the Oakland-Berkeley hills and resultant loss of firefighting water supply in the hill area is well beyond the scope of this EIR. If such an event were to occur, it could not be directly or indirectly attributed to the proposed project. In such a situation, the project site would be exposed to the same level of hazard as any other area of the hills.

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* Bailey, May 6, 1980, op. cit.

** Bailey, interview, Feb. 23, 1979

ENVIRONMENTAL CATEGORY: Fire Hazard/Vegetation

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 4, item d., 1st sentance, 2nd paragraph)

2. Public Testimony on:

Comment: "Unfortunately, the pine needle mulch is also a highly combustable fire hazard; however, it is felt that it can be replaced by appropriate combustion-resistant ground cover."

Response: Because of the heavy growth of pine plantation on the site, the ground is generally covered with a thick layer of pine needles. The extent of this cover will be somewhat reduced because of the tree removal required for project development.

It is not agreed that replacing the pine needle cover with planted ground cover would be a practical means of decreasing fire hazard. First, the pine needle cover in portions of the Oakland-Berkeley hills is primarily hazardous only a few days each year when the weather is dry and humidity is low. Otherwise, the needles are damp.* Second, in order for a ground cover to be planted, the existing layer of needles would have to be removed, but because there are so many

* Malcolm Sproul, M.L.A., EIR Vegetation and Wildlife Consultant, interview, May 1, 1980

pine trees on the site, the layer would soon be established again, possibly smothering the planted ground cover. The only ways to avoid the pine needle cover would be to remove the pine trees or to regularly rake up the needles, perhaps every few weeks,and neither of these is a practical or reasonable method.

The primary vegetative sources of fire hazard in the hill area are annual grasses and dense shrubs (little of either is found on the site), and trees, with trees being most dangerous when a fire is far enough out of control that it "crowns", reaching into the trees' foliage.

The focus of fire prevention for the site should be on adequate access and water supply, and fire-safe features for dwelling units.

ENVIRONMENTAL CATEGORY: Sewer Service

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 3, item 3.a.)

2. Public Testimony on:

Comment: "Although it is physically feasible to extend a sewer from Tunnel Road, it would be about 1600 feet long (outside of project limits). If this is funded by the developer, only growth impact would result. However, if it is financed by assessment district, it would impact the City's bonding capacity, and would involve City Council and staff in formation of the district, assessment hearings, etc."

Response: The developer proposes installation of all necessary sewer facilities at his own expense.

ENVIRONMENTAL CATEGORY: Traffic

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 2, 1st paragraph)

2. Public Testimony on:

Comment: "Under alternatives to the project is a comparison of the developer's proposal and one which would involve a standard street. There is a statement that'Option 2, as a dedicated street would not be under the control of the future homeowners, and might, therefore, tend to generate a considerable volume of vehicular traffic other than that produced by the future residents.' It is felt that this statement is not realistic, and that traffic generation under either option would be minor."

Response: It is not likely that a great deal of traffic would be generated under either option (p. 50, DEIR). There may be a minor amount of non-resident traffic in the form of sightseers.

ENVIRONMENTAL CATEGORY: Circulation

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 1, item 1.a.)

2. Public Testimony on:

Comment: Public Works recommends minimum sight distance of 250 feet for outbound vehicles at the intersection of Grizzly Peak Blvd. and the north end of the proposed subdivision loop road (see revised Tentative Map).

Response: Current sight distance from the point of this intersection, looking south along Grizzly Peak Blvd., is approximately 200 feet, greater sight distance being limited by the embankment just south of the intersection, along the project-site frontage. While 250 feet of sight distance would be ideal, the available sight distance is not expected to result in significant traffic hazard because of the relatively moderate traffic volume along Grizzly Peak Blvd. and the moderate project traffic-generation.

The primary problem associated with vehicle movements at this intersection would be the outbound left turn to the south, onto southbound Grizzly Peak Blvd. Additional sight distance could be obtained by cutting back the embankment south of the intersection. This would require the removal of shrubs and possibly six trees, would increase the height of the existing embankment, and would adversely affect the visual quality of the site.

Another option would be to make the loop street one-way, southbound, so that there would be only right and left turns inbound. This option, however, is not favored by Public Works. Nevertheless, this solution could work quite well, particularly if the outbound lane onto Grizzly Peak Blvd. were reduced in width to a single lane and curved to the north, into northbound Grizzly Peak, to preclude left turns in or out.

Probably the best way to avoid the sight distance problem would be to terminate the subdivision loop street just short of its northern intersection with Grizzly Peak Blvd. The resulting cul-de-sac would not greatly inconvenience project residents, and an emergency-only connection could be provided to Grizzly Peak Blvd., with a break-away gate or other functionally-similar facility to allow for emergency vehicle circulation. This option would require, at minimum, a hammerhead turnaround at private street standard--which would have less grading impact than a circular turnaround at public street standard. This solution would preclude any turning-movement problem at the intersection, would limit nuisance traffic along the loop street, and would provide good emergency vehicle circulation.

ENVIRONMENTAL CATEGORY: Parking

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p.1, item b.)

2. Public Testimony on:

Comment: Public Works commented that the subdivision streets should be made wider to provide for on-street parking and better emergency vehicle access.

Response: The revised Tentative Map includes new lot and subdivision street configurations, including a wider loop-street serving most of the lots (40 feet of public right-of-way with 28 feet of paving width).

ENVIRONMENTAL CATEGORY: Soil/Geology

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 3, 1st paragraph)

2. Public Testimony on:

Comment: Add the following sentence to the first paragraph, page 19 of the DEIR: "The report recommends that 'a detailed geotechnical investigation of the site be performed to develop earthwork, drainage, and foundation recommendations for the project'."

Response: This sentance is added to the DEIR as recommended.

ENVIRONMENTAL CATEGORY: Soil/Geology

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Oakland Public Works 1-22-80 (p. 2, item b.)

2. Public Testimony on:

Comment: Public Works has recommended the following conditions of approval related to soils and geology:

"Before any improvement plans are approved, a detailed soils investigation report for the entire site shall be prepared. The report shall have sufficient soil borings and analysis to recommend allowable cut and fill slopes for the project and be submitted to City staff for approval. The report should contain sufficient information to verify the ability of the site to support proposed improvements, and recommendations for foundation designs and correction of slope instabilities, as necessary. It should define areas where additional soils investigations should be prepared for individual lots within the tract."

"Prior to issuing any building permits, soil reports shall be prepared for individual lots as recommended in the project soils investigation report

(Several other sections of the Public Works interoffice letter of Jan. 22 indicate concern about steepness of cut slopes for the project roadway and potential for instability and erosion of the cuts.)

Response: The conditions above are included as EIR mitigation recommendations, replacing recommendation 3.a. on page 18 of the DEIR.

ENVIRONMENTAL CATEGORY: Grading

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | Oakland Public Works | 1-22-80 (p. 3, item 3.b. 2nd paragraph) |

2. Public Testimony on:

Comment: Public Works comments that with a single loop road through the project site, the visual impact of roadway grading would be reduced because of elimination of the middle intersection with Grizzly Peak Blvd. (see Tentative Map, DEIR) and because the single loop road would be located toward the rear of the site.

Response: The revised Tentative Map shows a roadway configuration consistent with this comment, with reduced grading, no middle intersection with Grizzly Peak Rd., and generally aligned toward the rear of the property.

ENVIRONMENTAL CATEGORY: Erosion

Comment Sources (See appendices)

1. Written Comments

A. Citizens:

| Name | Date |
|---|---|

B. Agencies or Departments:

| | |
|---|---|
| Oakland Public Works | 1-22-80 (p. 3, item 3.c.) |
| Alameda County Public Works | 1-23-80 (items 1 and 2) |

2. Public Testimony on:

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Comment: (Oakland) "Planting of cuts and fills for erosion control and visual impact should be included. Although the material is mostly rock, it probably is no more difficult to provide planting here than a currently proposed tract on Crestmont Drive near Redwood Road...where plantings are proposed on steep rock slopes by the developer's landscape architect."

(Alameda Co.) "Cut and fill slopes should have erosion protection."

"Cut and fill slopes should be no steeper than those that can support vegetation."

Response: The developer should hydromulch or plant all roadway fill slopes, and cut slopes where practical.

ENVIRONMENTAL CATEGORY: Erosion

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Alameda County Public Works 1-23-80 (items 4, 5)

2. Public Testimony on:

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Comment: "Construction should take place during the dry season."

"An erosion and sediment control plan should be prepared for the site."

Response: Limitation of construction of subdivision improvements to the dry season should be included as a condition of project approval.

Erosion and sediment control features should be included with the project improvement plans.

ENVIRONMENTAL CATEGORY: Drainage

Comment Sources (See appendices)

1. Written Comments

| A. Citizens: | Name | Date |
|---|---|---|
| | | |

| B. Agencies or Departments: | Oakland Public Works | 1-22-80 (p. 4, item d., 2nd paragraph, last sentance) |
|---|---|---|

2. Public Testimony on:

Comment: "It is felt that, with the indicated retention capacity of the area, the proposed on-site disposal of roof runoff, the amount of water reaching the roadways under either Option 1 or 2 could be handled by conventional curb and gutter and storm drain conveyance without severe impact on the environment."

Response: The previously-proposed subdivision plan (see Tentative Map, DEIR) included paved streets with no curb and gutter. The revised plan (see Tentative Map in this document) includes curb and gutter. No major drainage impact is expected as a result of installation of curb and gutter.

ENVIRONMENTAL CATEGORY: Drainage

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: Alameda County Public Works 1-23-80 (item 3)

2. Public Testimony on:

Comment: "The DEIR does not state that drainage facilities will be built as proposed by the DEIR."

Response: The DEIR recommends that the proposed drainage improvements described in the DEIR should be implemented through City review and approval of drainage plans (DEIR, p. 27, item 3.b.iii.).

ENVIRONMENTAL CATEGORY: Possible Annexation of Contra Costa County Land

Comment Sources (See appendices)

1. Written Comments

A. Citizens:

| Name | Date |
|---|---|
| The Orinda Association | 4-9-80 |

B. Agencies or Departments:

2. Public Testimony on:

---

Comment: "...we note in Appendix C contemplated annexation of several Contra Costa County parcels which would be oriented to Oakland for their services and question whether this would have an effect on Orinda at a later date."

Response: The discussion of annexation of portions of Contra Costa County is contained in the City's 1977 study of the then-proposed EBMUD water supply reclassification.* The study did not indicate that annexation of areas along

* City of Oakland, July, 1977, Impact Assessment Study of E.B.M.U.D. Reclassification of Emergency Facilities Along Grizzly Peak and Skyline Boulevards, p. 7 (Appendix C, p. C-1 of the DEIR)

Grizzly Peak Blvd and Starkville Ct. was "contemplated". These areas were included in the City's study only to indicate the number of additional dwelling units--among other potential units in the City's hill area--that might require City services if the EBMUD reservoirs were reclassified and annexation were to occur.

Annexation of the Contra Costa County areas discussed in the City's study would require separate review and approvals by Oakland, Contra Costa County, and LAFCO--probably including environmental review.

ENVIRONMENTAL CATEGORY: Development Precedent for Orinda Area

Comment Sources (See appendices)

1. Written Comments

A. Citizens:

| Name | Date |
|---|---|
| The Orinda Association | 4-9-80 |

B. Agencies or Departments:

2. Public Testimony on:

---

Comment: "We...are concerned with the precedential aspect of the extension of water and other services as proposed and the possibility this sort of reclassification of water supplies may occur in Orinda as well."

Response: Only a limited area of Contra Costa County could be served by the hill area temporary-emergency facilities. The water supply would have to be from the Berkeley Hills Reservoir or the Round Top Reservoir rather than from the Hilltop Reservoir. Reclassification of water in these two reservoirs would require action by EBMUD which would be subject to environmental review.

ENVIRONMENTAL CATEGORY: Potential Well Shaft Hazards to Caldecott Tunnel

Comment Sources (See appendices)

1. Written Comments

A. Citizens:

| Name | Date |
|---|---|

B. Agencies or Departments:

| | |
|---|---|
| State of California Department of Transportation | 1-9-80 |

2. Public Testimony on:

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Comment: "If test wells are to be drilled in the area, care should be taken to keep clear of the existing and proposed tunnels." (Caldecott Tunnel)

Response: Water wells are not anticipated for the proposed project, and the DEIR water-supply analysis rejects the well-water alternative because of "...the potential problems of maintaining adequate fire-fighting water supply..." However, as a safeguard against unforeseen well problems related to the Caldecott Tunnel, the City could include a condition of project approval requiring City and Department of Transportation review and approval of well drilling operations.

ENVIRONMENTAL CATEGORY: Potential Seepage Hazards to Caldecott Tunnel

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | State of California, Department of Transportation | 1-9-80 |

2. Public Testimony on:

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Comment: "The document (the DEIR) does not address the impacts associated with seepage due to possible breaks in the proposed water main that may affect the Caldecott Tunnel and soils above it."

Response: 1. Caltrans has expressed two concerns about possible impacts of a broken water main in Grizzly Peak Blvd. on the Caldecott Tunnel and Highway 24:*

A. Seepage through the ground which might affect the tunnel and related facilities;

B. Surface mud flow which might affect Highway 24 and the external tunnel and facilities.

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* Cyrus Jones, California State Dept. of Transportation, San Francisco, interview, May 2, 1980

2. The proposed project water main to the site would be installed by EBMUD, at the expense of the developer, in the Grizzly Peak Blvd. right-of-way and would be part of the regular, public water distribution system for which EBMUD would be responsible. Therefore, EBMUD would be responsible for any problems resulting from a break in the main.

3. EBMUD does not consider a break in the proposed water main to be a substantial potential hazard to Highway 24, the Caldecott Tunnel, or related facilities, for the following reasons:*

A. The volume of water escaping from such a break would not be great;

B. Water from a broken main would seek the path of least resistance and, therefore, would tend to flow toward the surface of the street, washing out the pipeline-trench backfill rather than flowing downward through the bedrock of the ridge.

4. As a matter of standard engineering practice, manually-operated shutoff valves are located at approximately 600-foot intervals along 6- and 8-inch water mains. Therefore, if there were a break in the main, one of these valves could be closed to limit the loss of water. (The water supply can also be shut off at the Hilltop Reservoir.)

5. Water flowing to the surface of the street from a broken main would flow into the existing downstream drainage system.

6. The Department of Transportation has only generally addressed the question of potential problems related to a water main break and has not provided any specific geologic or engineering questions. Therefore, if the project is approved, the Department should be notified by the City of the approval and advised to contact EBMUD to arrange staff discussion of potential problems and solutions. (One method of responding to the potential of a water main break would be for EBMUD to install a steel pipe, for additional strength, rather than the proposed asbestos cement pipe. The developer would have to pay the extra cost of the steel pipe.)

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* Rich Kolm, East Bay Municipal Utility District, interview, May 5, 1980

ENVIRONMENTAL CATEGORY: Growth Inducement

Comment Sources (See appendices)

1. Written Comments

| A. Citizens: | Name | Date |
|---|---|---|
| | | |

| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (p. 2, 1st paragraph) |
|---|---|---|

2. Public Testimony on:

---

Comment: "The City's Draft EIR includes an estimate of the maximum development expected in the Hilltop Pressure Zone (p. 38), describes the impacts (pp. 37-46), and finds that the most likely development would not be expected to result in significant impacts (Summary Section C.1.g. Growth-Inducement). The need for mitigation measures specified in Summary Section D.2.g. is inconsistent with the conclusion in Section C.1.g."

Response: The City has defined the project as 1) the proposed subdivision and 2) reclassification of enough Hillside Reservoir water to serve the subdivision. Water service for the project would require the extension of a water main to the site. The City's judgement is that the estimated number of future units that could be served from this main--including project units--"...would result in cumulative adverse impacts but would not be expected to result in significant impacts (DEIR summary, item C.1.g.), and this estimation is included because state EIR guidelines require consideration of project growth-inducing impacts. The DEIR

also notes a distinction between direct and indirect growth-inducing impact. As the project is defined, extension of the proposed water main and reclassification of enough Hilltop Reservoir water to serve the subdivision would have "...no direct growth-inducing impact other than the setting of a development precedent for the vacant parcels along the Grizzly Peak Blvd./Skyline Blvd. corridor" (DEIR summary, item C.1.g.). Construction of the water main, however, would have indirect growth-inducing impact. That is, the main would be physically available for future developments but such developments would be subject to separate environmental review since this project does not include reclassification of enough Hilltop Reservoir water to serve such developments.

The City's attitude is that the hill area around the project site is sensitive enough that future developments served from the project water main should be subject to separate environmental review, and this attitude is expressed in the definition of the scope of the project.

ENVIRONMENTAL CATEGORY: Growth Inducement

Comment Sources (See appendices)

1. Written Comments

A. Citizens: Name Date

B. Agencies or Departments: E.B.M.U.D. 1-21-80 (p. 3, paragraphs 7 and 8)

2. Public Testimony on:

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Comment: "...on page 37, under B.2 Potential Long-Term Development, two alternative estimates are presented, a 'worst-case situation (Case I) and a probable maximum situation (Case II)'. In its Environmental Assessment, EBMUD found it necessary to also consider a Case III (City's Draft EIR p. B-6). This was generated by EBMUD from the City's Case II, assuming that the vacant unsubdivided land will be rezoned from the present R-30 to R-10 zoning with 25,000 square foot lots.

"This conforms to the recommendation of the City's North Hill Area Study Report. The City's Draft EIR notes the general effect of the recommended rezoning in the descriptions of Case I and Case II on p. 41. However, the potential development should be described in detail as was done for Case I and Case II on p. 38."

Response: The EBMUD estimate (their Case III") is discussed in EBMUD's "Assessment"*. They estimate that 38 new units, including proposed project units, could be built in the Hilltop Pressure Zone, with rezoning of undeveloped residential land from R-30 to R-10 (5,000 to 25,000 sq. ft. lots, respectively) as recommended in the City's North Hill Area Study Report.** This appears to be a reasonable estimate.

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* East Bay Municipal Utility District, Oct., 1979, Draft Environmental Assessment for Extension of Water Service in Hilltop Pressure Zone, Including Removal of Special Classification of Related Distribution Facilities

** The North Hill Area Study is available for public review at the City Planning Department office. The recommendations of this study have been under review by the City Planning Commission and the City Council during preparation of this EIR.

ENVIRONMENTAL CATEGORY: Growth-Inducement

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (last paragraph, p. 3, through 1st paragraph, p. 4) |

2. Public Testimony on:

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Comment: "...on p. 43, Section b. City of Oakland summarizes the City's estimate of potential new development within the service areas of the Distirct's facilities classified as emergency. This estimate is based on the City's July 1977 study report and is significantly greater than EBMUD's estimate. EBMUD believes that the City's estimate was unrealistic since it covered a more extensive area, it considered public lands as developable, and it did not consider the physical limitations of the steep lots. The City's estimate was not used when the proposed Final EIR on the Reclassification wa prepared in 1977, as explained on pages 13-20 in that proposed Final EIR, of which the City has a copy."

Response: 1. The document referred to as "...the City's July 1977 study report..." is: City of Oakland, July, 1977, Impact Assessment Study of E.B.M.U.D. Reclassification of Emergency Facilities Along Grizzly Peak and Skyline Boulevards. This document is contained as Appendix C of the project DEIR, and the study and background information are available for public review at the Planning Department office.

2. The document referred to as "...the proposed Final EIR on the Recalssification..." is: East Bay Municipal Utility District, Aug., 1977, Final EIR on Reclassification of Temporary Emergency Facilities in the Oakland-Berkeley Hill Area. Copies of this document are available for public review at the Planning Department and EBMUD offices.

3. The City's Impact Assessment Study was intended to provide a maximum-density or worst-case analysis of potential development in the hill area. This kind of analysis is based on certain assumptions about the long-range development potential in terms of area and density. The information developed by EBMUD in their Final EIR on Reclassification was based on a different set of assumptions.

ENVIRONMENTAL CATEGORY: Growth-Inducement

Comment Sources (See appendices)

1. Written Comments

| | Name | Date |
|---|---|---|
| A. Citizens: | | |
| B. Agencies or Departments: | E.B.M.U.D. | 1-21-80 (p. 4, paragraphs 4 and 5) |

2. Public Testimony on:

Comment: (DEIR, p. 46, Section D) "The third paragraph suggests that without the emergency facilities, new water facilities would have been gradually provided in a long-term process, allowing the community to steadily adapt to slowly increasing impacts of additional development. In reality, water facilities are provided in response to requests for service. In absence of the City's effective control or direction of the rate of growth, the normal course of events may not have been gradual.

"When EBMUD plans, designs, and constructs a new reservoir, it does not limit the capacity to the immediate service request--for practical and environmental reasons it must consider future potential growth that may be permitted by the land use planning agency's General Plan and zoning. Thus, there is not a gradual provision of capacity to extend service. Water storage and distribution facilities do not lend themselves to gradual growth control--the facilities are either present or they're not. Controls intended to permit gradual growth mus be imposed by the land-use planning agency."

Response: The paragraph to which EBMUD refers reads as follows:

> "In the normal course of events, it would be expected that the vacant hill lands of the project area would be developed incrementally, with expansion of development from the existing built-up areas around the hills and with new water supply facilities being provided within this pattern of growth as each major increment of development occurs. This would be a long-term process in which the community could steadily adapt to the slowly increasing impacts of additional development (or could adapt plans and policies to change the level of impact."

It seems reasonable to assume that if the three temporary-emergency reservoirs in the hill area had not been built at one time for emergency purposes, that they would have been built at different times; that is, incrementally, as a function of development demand, with each pressure zone being one unit of incremental development. Thus, if, under such a scenario, the Hilltop Reservoir had been built first, the City could have examined the development impact of its water service and made land-use planning decisions about other portions of the hill area. It is understood that it would not be practical to build half of a reservoir, and related facilities, in anticipation of later construction of the rest of the reservoir, when development pressure and zoning clearly indicated the the entire system should be built at one time.

STATE OF CALIFORNIA—BUSINESS AND TRANSF ATION AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
P. O. BOX 3366 RINCON ANNEX
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SCH 79121806A
City ER 79-23

Mr. Willie Yee, Jr.
Assistant Planner, City of Oakland
City Hall - 14th & Washington
Oakland, CA 94612

Subject: Caltrans, District 4 comments on the DEIR for Grizzly Peak Estates, a 19 unit single family subdivision.

The document does not address the impacts associated with seepage due to possible breaks in the proposed water main that may affect the Caldecott Tunnel and soils above it.

If test wells are to be drilled in the area, care should be taken to keep clear of the existing and proposed tunnels.

Sincerely yours,

T. R. LAMMERS
District Director

By R. W. Sieker

R. W. SIEKER
District CEQA Coordinator

cc: State Clearinghouse

APPENDIX A

EBMUD

EAST BAY MUNICIPAL UTILITY DISTRICT

2130 ADELINE STREET P.O. BOX 24055 OAKLAND CA 94623 • (415) 835 3000

LEROY JORGENSEN
Assistant General Manager, Administration

January 21, 1980



Mr. Norman J. Lind
Director of City Planning
Oakland City Hall
14th and Washington Streets
Oakland, CA 94612

Dear Mr. Lind:

Subject: Draft Environmental Impact Report,
Grizzly Peak Estates, ER 79-23

Thank you for the opportunity to review the subject Draft Environmental Impact Report. We appreciate the time you and your staff spent in considering EBMUD's input to the report under the Lead Agency principle. However, we are disappointed that the District's complete Environmental Assessment* was not appended to the Draft EIR. You reproduced selected portions of it on pages B-4 through B-7, without identifying it as to source or date. Enclosed with this letter is another copy of that Environmental Assessment, which we ask you to include in the Final EIR, along with this letter, as the District's official comments on the City's Draft EIR.

As you know, the "project" covered by EBMUD's Environmental Assessment is the action of the EBMUD Board of Directors to provide storage capacity for extension of water service in the Hilltop Pressure Zone if the proposed Grizzly Peak Estates subdivision is approved by the City. In particular, it is the removal of the special classification of Hilltop Reservoir and Pumping Plant to make those facilities part of the regular distribution system.

The City's Draft EIR describes the project water supply as including only partial removal of the special classification (last paragraph on p. 7). EBMUD's Environmental Assessment describes this approach as one alternative. Partial removal for Grizzly Peak Estates would mean that there would have to be subsequent partial removals of the special classification when the City approves other new subdivisions or when it issues building permits for individual new homes. It is unclear what benefit this would achieve. In effect, this extra administrative procedure would not make water service conditions any different than if the special classification is completely removed.

---

* Draft Environmental Assessment for Extension of Water Service in Hilltop Pressure Zone, including removal of Special Classification of Related Distribution Facilities, EBMUD, November 1, 1979.

The City's Draft EIR includes an estimate of the maximum development expected in the Hilltop Pressure Zone (p. 38), describes the impacts (pp. 37-46), and finds that the most likely development would not be expected to result in significant impacts (Summary Section C.1.g. Growth-Inducement). The need for mitigation measures specified in Summary Section D.2.g. is inconsistent with the conclusion in Section C.1.g.

Complete removal of the special classification of the Hilltop facilities is not listed in the alternatives section of the City's Draft EIR (pp. 49-51). However, an EBMUD decision to remove the special classification for more than just the Grizzly Peak Estates development is discussed in the City's Draft EIR as part of the decision-making options for the project area (pp. 46-48). Parenthetical statements indicate that such an EBMUD decision would be expected to require, or would require, environmental review (Options 3 and 4 on p. 47). It is unclear what procedural process this is suggesting and why it would be necessary, considering the discussion of maximum development and complete removal of the special classification that is contained in the City's Draft EIR.

Other comments, on a page-by-page basis, are as follows:

On page 7, under b. Project Water Supply, the last sentence of the third paragraph should be revised to read "...the EBMUD Board would have to reclassify all or a portion of the remaining 212,000 gallons from emergency to domestic use".

On page 7a, the first sentence at the top of the page should be corrected to read "At an estimated maximum water use of 700 gallons/day/unit, and with EBMUD's planning criterion of storage equal to that maximum rate of water use for two days, at least 18,000 gallons would have to be reclassified--about 8.5 percent".

Also on page 7a, the second paragraph at the top of the page should be clarified by adding "EBMUD will only consider removal of the special classification if the Final EIR and the Tentative Map for the development project are approved by the City and if the EBMUD Board of Directors certifies the Final EIR as adequate for its proposed action."

On page 7c, the first "reason" near the top of the page should be corrected to read "At least two years would be required for site selection and acquisition, development of conceptual plans, preparation and processing of environmental documentation, and construction".

In the second "reason", "would result" should be changed to "may result". Visual impact of a reservoir can be minimized in a number of ways.

The parenthetical statement following the third "reason" should be deleted. It implies that EBMUD would continue to restrict water service from the emergency facilities to control growth. Water service from the emergency facilities has been restricted not to control growth, but to allow the City time to take appropriate actions pursuant to its land use planning authority and responsibility to define, control, or direct the residential development of privately owned lands in the hill area (EBMUD Board Resolution 28309, October 11, 1977). EBMUD does

not have legal authority to control growth; such authority has only been granted to cities and counties.

On page 9, in the fourth paragraph, the second sentence should be revised to read "...and EBMUD can supply 1,000 gallons per minute fire flow at a hydrant in accordance with EBMUD standards and as specified by the Fire Department (see Appendices, pp. B-4 and M-1)".

On page 11, Section 3b should be deleted. Replacements of water facilities throughout the District's distribution system are financed by general funds, not by the existing customers specifically served by those facilities. This area cannot be treated differently than other areas in the District.

The footnote to Section 3b is incorrect. The life of the three reservoirs classified as emergency has not been estimated. The District's Environmental Assessment states that "EBMUD presently has 14 redwood distribution reservoirs in service with an average age of 33 years".

On page 37, under II.B.1. Domestic Water, the first paragraph should be clarified by adding "EBMUD may consider complete removal of the special classification of the Hilltop Pressure Zone facilities, in which case subsequent requests for additional reclassification would be unnecessary."

In the second paragraph, the second and third sentences should be corrected to read "...would require only removal of the special classification of facilities in the Hilltop Pressure Zone. Therefore, this discussion is focused on the potential long-term, indirect impacts of that specific action, and addresses the entire hill area only generally,...".

Also on page 37, under B.2 Potential Long-Term Development, two alternative estimates are presented, a "worst-case situation (Case I) and a probable maximum situation (Case II)". In its Environmental Assessment, EBMUD found it necessary to also consider a Case III (City's Draft EIR p. B-6). This was generated by EBMUD from the City's Case II, assuming that the vacant unsubdivided land will be rezoned from the present R-30 to R-10 zoning with 25,000 square foot lots.

This conforms to the recommendation of the City's North Hill Area Study Report. The City's Draft EIR notes the general effect of the recommended rezoning in the descriptions of Case I and Case II on p. 41. However, the potential development should be described in detail as was done for Case I and Case II on p. 38.

On page 43, under a. EBMUD, the second sentence should be corrected to read "EBMUD has also estimated that the potential development in the Hilltop Pressure Zone is 38 new units, considering the rezoning of undivided properties by the City (see p. B-6, Case III estimate)".

Also on p. 43, Section b. City of Oakland summarizes the City's estimate of potential new development within the service areas of the District's facilities classified as emergency. This estimate is based on the City's July 1977 study report and is significantly greater than EBMUD's estimate. EBMUD believes that

the City's estimate was unrealistic since it covered a more extensive area, it considered public lands as developable, and it did not consider the physical limitations of the steep lots. The City's estimate was not used when the proposed Final EIR on the Reclassification was prepared in 1977, as explained on pages 13-20 in that proposed Final EIR, of which the City has a copy.

On page 46, under Section D. City of Oakland and EBMUD Decision-Making, the first paragraph says that "... the Distict apparently feels obligated to provide domestic service ...". That should be corrected to read (beginning on the third line) "... the District has a legal obligation as a utility to grant reasonable extensions of service to properties within its boundary, ...".

The second paragraph notes the City's concern about the impact of growth, explaining that the concern is well founded based on the City's July 1977 study report. As explained earlier in this letter, EBMUD believes that the City's estimate of growth was not realistic (refer to pp. 13-20 from EBMUD's proposed Final EIR on Reclassification).

The third paragraph suggests that without the emergency facilities, new water facilities would have been gradually provided in a long-term process, allowing the community to steadily adapt to slowly increasing impacts of additional development. In reality, water facilities are provided in response to requests for service. In absence of the City's effective control or direction of the rate of growth, the normal course of events may not have been gradual.

When EBMUD plans, designs, and constructs a new reservoir, it does not limit the capacity to the immediate service request--for practical and environmental reasons it must consider future potential growth that may be permitted by the land use planning agency's General Plan and zoning. Thus, there is not a gradual provision of capacity to extend service. Water storage and distribution facilities do not lend themselves to gradual growth control--the facilities are either present or they're not. Controls intended to permit gradual growth must be imposed by the land-use planning agency.

The emergency facilities have been in existence for more than six years. In view of the City's expression about the problems of growth in the hill area, EBMUD wanted the City to have time to take appropriate actions pursuant to its land use planning authority and responsibility. The City Manager's letter of December 22, 1977, informed EBMUD that the Planning Commission had identified the need for a number of potential changes in the City's land use policy and had directed City planning staff to study the affected hill area. The City's recent consideration of the appropriate zoning of the undivided properties in the north hill area is the type of study the District was anticipating. The City's North Hill Area Report in July 1979 referred to the need for additional studies, including an analysis of the rezoning of vacant subdivided land.

On page 47, several decision-making options are described. Options 3 and 4 indicate that an EBMUD decision to remove the special classification for more than the Grizzly Peak Estates development would be expected to require, or would require, environmental review. As stated earlier in this letter, it is unclear what procedural process this is suggesting and why it would be necessary.

Option 4 would continue the special classification for the 180,000 gallons needed for fire fighting reserve. This would be a meaningless and unnecessary action. The special classification should be completely removed under this option.

On page 48, under III. Adverse Environmental Effects Which Cannot Be Avoided, "growth-inducing impact of extension of water ... lines" is listed. The City's Draft EIR points out that the maximum growth in the Hilltop Pressure Zone area "would result in cumulative adverse impacts but would not be expected to result in significant impacts" (Summary section C.1.g.). The finding that the adverse impacts would not be significant should be made clear in this list of adverse environmental effects. The same revision should be made in the Summary section C.2.

In meetings between the City and EBMUD prior to the City's completion of this Draft EIR, EBMUD indicated a willingness to participate with the City in its studies of potential development in areas served by the water facilities classified as emergency. We reaffirm that willingness to work with the City and to try to seek a reasonable conclusion for the present situation.

Very truly yours,

Leroy Jorgensen

LEROY JORGENSEN
Assistant General Manager, Administration

Enclosures

# CITY OF OAKLAND
## Interoffice Letter

To: City Planning Department Attention: Norman J. Lind Date: January 22, 1980

From: Director of Public Works

Subject: Draft E.I.R. Grizzly Peak Estates



The Office of Public Works has reviewed the subject Environmental Impact Report and offers the following comments:

1. Traffic Engineering and Parking Department

   a. Traffic Hazard at Subdivision Entrance

   We do not support rumble strip on Grizzly Peak Boulevard as its effectiveness is questionable. We also do not support restriction on turns from the subdivision street or one-way traffic flow on this street; there will be little or no compliance to these restrictions because of lack of enforcement. We recommend that a minimum sight distance of 250 feet be provided.

   b. Narrow Subdivision Streets

   Effectiveness of no parking restrictions on these streets is questionable even if DMV laws of State are made applicable, again because of the lack of enforcement.

   Mitigation alternatives listed on page 15 should include a simple and proven alternative for mitigating adverse impacts created by the proposed narrow roadways, such as lack of adequate width for inevitable on-street parking by residents and guests, the impaired use of the street by residents, fire fighting and other emergency vehicles, impairment of access to and egress from garages with 5-foot setbacks, lack of sidewalks for the safety and convenience of children and other pedestrians, etc. This alternative is the provision of a standard subdivision street with a 30-foot roadway in a 40-foot right-of-way, shown in "Option 2" on Page 50. (The private access easement appended to this option serves only 4 lots, and is an acceptable concept.) We recommend that either (a) the streets be made wider to accommodate on-street parking, or (b) adequate off-street parking be provided as suggested in the E.I.R. to eliminate the need for on-street parking.



600-10

c. Under alternatives to the project is a comparison of the developer's proposal and one which would involve a standard street. There is a statement that "Option 2, as a dedicated street would not be under the control of the future homeowners, and might, therefore, tend to generate a considerable volume of vehicular traffic other than that produced by the future residents." It is felt that this statement is not realistic, and that traffic generation under either option would be minor.

2. Engineering Services Division

a. Soil/Geology/Seismicity (Page 16)

1-d, spelling of "known."

b. Mitigation Alternatives

Before any improvement plans are approved, a detailed soils investigation report for the entire site shall be prepared. The report shall have sufficient soil borings and analysis to recommend allowable cut and fill slopes for the project and be submitted to City staff for approval. The report should contain sufficient information to verify the ability of the site to support proposed improvements, and recommendations for foundation designs and correction of slope instabilities, as necessary. It should define areas where additional soils investigations should be prepared for individual lots within the tract.

Prior to issuing any building permits, soil reports shall be prepared for individual lots as recommended in the project soils investigation report.

c. Grading and Aesthetics

Subdivision Roads - The major earthwork required for project development will be cuts and fills for the subdivision streets. Cuts proposed at 1:1 and fills at 2:1 are subject to change depending on a detailed soils investigation report of the site. These proposed cuts and fills will generally be moderate in size....

This proposed slope rate for cuts is significantly steeper than those normally used in Oakland (1:1 vs. 1-½:1), although, as the report notes, the geotechnical report indicates an opinion that "steep roadcuts can be made provided they are no steeper than the inclination of the shale beds," it also notes that "periodic ravelling of the beds and consequent removal of beds which slump onto the roadway should be anticipated." No indication is made whether the shale bed slope will accommodate a 1:1 cut slope.

Add to last sentence that quotes geotechnical report. Report recommends that "a detailed geotechnical investigation of the site should be performed to develop earthwork, drainage and foundation recommendations for the project."

3. Planning and Design Division

a. Utilities and Community Facilities

1-g, Sanitary Sewer (p.5). Although it is physically feasible (if easements can be acquired) to extend a sewer from Tunnel Road, it would be about 1600 feet long (outside of project limits). If this is funded by the developer, only growth impact would result. However, if it is financed by assessment district, it would impact the City's bonding capacity, and would involve City Council and staff in formation of the district, assessment hearings, etc.

b. Environmental Impact (Pages 19, 20)

Although the maximum cut height would be only 20 to 25 feet, the proximity of these steep cuts to homesites, the anticipated erosion and the additional difficulty in establishing planting and other erosion control measures raise a question whether the cleanup nuisance, possible hazard to residents and the anticipated visual impact would make a flatter slope more desirable, particularly in the area where slumping was noticed by the geotechnical consultant.

The statement on Page 21 that "Major visual impact could be anticipated with a wide standard road and resulting larger roadway cuts and fills" is a gross exaggeration, and is not demonstrated in any portion of the report, including the comparison of the proposed narrow roadway (Option 1) with a standard street (Option 2) offered on page 49, 50 and 51 (the illustrations for which are illegible). A standard street (30-foot roadway in a 40-foot right-of-way) has a right-of-way only 14 feet wider than the road proposed by the developer and the total visual impact would be similar, or perhaps less because of the elimination of the middle intersection with Grizzly Peak Boulevard. Since the proposed homesites with rear lot lines on Grizzly Peak Boulevard will be "partially screened by trees and location along Grizzly Peak" (c. Home Sites, p. 19), the roadway behind these homes would be screened in this manner and by the homes. Grading for homesite preparation and driveway construction may be as visually significant as roadway grading.

c. Mitigation Alternatives (page 21)

Planting of cuts and fills for erosion control and visual impact should be included. Although the material is mostly rock, it probably is no more difficult to provide planting here than a currently proposed tract on Crestmont Drive near Redwood Road (Redwood Hills III) where plantings are proposed on steep rock slopes by the developer's landscape architect.

d. Drainage/Water Quality

The hydrological report indicates that the infiltration rate of rainfall into the upturned rock formation would exceed the rainfall intensity for a 100-year storm. It also recommends not disturbing the ground cover, a thick vigorous mulch consisting of pine needles and debris falling from trees because it is ideal detention and protects the underlying soil from compaction. The hydrological report also recommends steep cut slopes, minimization of paved area and avoidance of concentrating runoff by use of curbs and gutters.

Unfortunately, the pine needle mulch is also a highly combustible fire hazard; however, it is felt that it can be replaced by appropriate combustion-resistant ground cover. The geotechnical report indicates use of steep cut slopes (eg. 1:1) will lead to periodic ravelling and need for removal of slumped materials from the roadbed. It would also be more difficult to establish erosion control measures. It is felt that, with the indicated retention capacity of area, the proposed on-site disposal of roof runoff, the amount of water reaching the roadways under either Option 1 or 2 could be handled by conventional curb and gutter and storm drain conveyance without severe impact on the environment.

e. Site Plan Alternative (Pages 49, 50, 51)

The comparison of Option 1, private access easements and Option 2, a standard street (30-foot roadway in a 40-foot right-of-way) along with part of one of the private access easements of Option 1, fails to consider adverse impacts of Option 1 and advantages of Option 2, most of which are discussed hereinbefore. In addition, Option 1 contains 2, not 3 private access easements as stated. The maximum number of lots that are permitted to be served by a private access easement is 4. In Option 1, 10 homesites would be served by one of the easements and 8 by the other. Legal frontage requirements would not be provided.

JAMES E. McCARTY

KL:mw

COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
ALAMEDA COUNTY FLOOD CONTROL
AND
WATER CONSERVATION DISTRICT
399 Elmhurst Street • Hayward, CA 94544 • (415) 881-6[illegible]



January 23, 1980

Mr. Norman J. Lind
Planning Director
City of Oakland
14th & Washington Streets
Oakland, California 94612

Subject: Grizzly Peak Estates ER79-23

Dear Mr. Lind:

Thank you very much for the opportunity to comment on the DEIR for the Grizzly Peak Estates - ER79-23.

The District's review of the subject DEIR has resulted in the following comments:

1. Cut and fill slopes should have erosion protection.

2. Cut and fill slopes should be no steeper than those that can support vegetation.

3. The DEIR does not state that drainage facilities will be built as proposed by DEIR.

4. Construction should take place during the dry season.

5. An Erosion and Sediment Control Plan should be prepared for the site.

6. It is crucial that the road configuration on page 24 of the DEIR be maintained as shown to assure that sheet flow conditions of runoff be maintained.

If we can be of further assistance, please do not hesitate to contact us.

Very truly yours,

PAUL E. LANFERMAN
ENGINEER-MANAGER

PEL:FMW:km

cc: Engineer Manager
IAC
DS III

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

January 29, 1980

Willie Yee, Jr.
City of Oakland
City Hall 14th & Washington
Oakland, CA 94612

Subject: SCH# 79121806 Grizzly Peak Estates

Dear Mr. Yee:

State agencies have commented on your draft environmental document (see attached). If you would like to discuss the concerns and recommendations in their comments, contact the staff from the a agencies whose names and addresses appear on the comments.

You may formally respond to the agencies' comments by writing to them (including the State Clearinghouse number on all such correspondence). When filing the Final EIR, you must include all comments and responses (State EIR Guidelines, Section 15146). State review of your draft environmental document will then be complete.

To aid in preparing environmental assessments on future projects, you should send to state agencies and the Office of Planning and Research your Notice of Preparation as prescribed by AB 884 and Section 15066 of the EIR Guidelines.

If you would care for assistance or if the need arises, the Office of Planning and Research is available to help identify responsible agencies, distribute Notices of Preparation, organize coordination meetings, mediate disputes, and hold consolidated hearings.

Please contact Anna Polvos at (916) 445-0613 if you have any questions.

Sincerely,

Kathryn E. Obias

Stephen Williamson
State Clearinghouse

Attachment
cc: Ken Fellows, DWR

SAVE THE HILLS ASSOCIATION

7065 Marlborough
Berkeley Ca. 94705
January 18, 1980

Norman J. Lind, Director City Planning
City Hall, Oakland Ca. 94612

File #ER 79-23

Dear Mr. Lind,

SAVE THE HILLS met last night, January 17, to have a final discussion on the DEIR for the Grizzly Peak Estates, and agreed unanimously that the lack of plans by the City for the North Hills developments makes it increasingly difficult to assess what is going on.

It is also difficult to act upon this DEIR because of the negative decision by the Planning Commission upon the rezoning proposition by the Planning Department for larger lots. Since the final decision on this is with the Council, much of the discussion in the DEIR and upon which we would base any suggestions is ephemeral.

However, with memories of the 1970 fire, the largest since the 1924 Berkeley fire, we demand and request that there be, as most important in any plans of the City (p.46), utmost concern be given to adequate water supply and fire protection.

TO BUILD UP THE AREA AND THEN PERMIT IT TO BURN DOWN IS FOLLY, AND ALSO LOSS OF REVENUE.

We state that, without City plans, suggestions in the DEIR that nibbling at emergency water supplies will not stimulate as rapid building as new water mains from resident water supplies, are not very convincing, sort of like cutting off the puppies tail by inches. For this reason we favor decision-making option #5 (p.48).

But this option would be very controversial, because would it not apply only to unsubdivided land? A loophole has already been found by builders on Skyline, and we forsee more.

Building in the hills will be very rapid in case the Council agrees with the Planning Commission, because the City would not have had time to make binding regulations to control it. Therefore we demand that action be taken to bring this Fire Station into existence coincidental with plans for home construction.

APPENDIX B

Very truly yours,

Victor Cassman, Irene Good, Concetta Jorgensen, May and Peter Blos, Jack Good.

May Blos

May Blos

6890 Charing Cross Road
Berkeley, California 94705
January 19, 1980

Oakland City Planning Commission
Sixth Floor
City Hall
1421 Washington Street
Oakland, California 94612

RE: GRIZZLY PEAK ESTATES DRAFT EIR
File No. ER 79-23

To the Commission:

On the draft EIR:

1. Earth removal/scarring of ridgetop: The inclusion of a tennis court in the project plans would result in excessive earth removal and scarring of the ridgetop. A tennis court is a facility that is imcompatible with maintaining a maximum amount of natural open space.

2. Fire hazard: Any change in present policy that diminishes even slightly the present inadequate fire service in this hill area should not be considered until a shorter fire department response time has been accomplished by building and maintaining a fire station in the area of Grizzly Peak and Marlborough. Until that time, re-classification of the water supply is a profound environmental danger to a neighborhood in which 38 homes were destroyed by fire in 1970.

Yours truly,

Elizabeth Moss

Elizabeth Moss

cc: Save the Hills Association

JAN 23 1980

29 Live Oak Road
Berkeley Ca. 94705
January 21, 1980

Willie Yee, Jr. Assistant Planner
Oakland Planning Department, City Hall, Oakland Ca. 94612

Dear Willie Yee,

This is the day for remarks upon the DEIR File #ER 79-23, and you say there are none from our area.

Unfortunately we were gone until last week, and unavailable; it seems that the local residents have become exhausted with the exertions connected with the Varney and Marg developments, and do not respond much to this latest. Also the holidays were more of a distraction this year.

So a lastminute meeting had to be held with a few; the letter resulting from this was sent to Mr. Lind on Friday last, and copies to the Council, to you and to Mr. Doctor, etc.

We must compliment you and those responsible on this DEIR, and actually it was so complete that it should be presented to the Council in toto, with our backing,for their action upon the future of the changes in zoning.

As you are aware, those who remember the 1970 fire are still very firm on water supply, and the locating of a Fire House in the area. Unfortunately, the uncertain situation about the future zoning density makes a detailed stand by us difficult to plan upon.

If the Council will make a supporting decision for the Planning Department, and SOON, the existence of something more than a evadeable motion will give us much more to support.

As it is, the plots of land designated by you for larger lots are being pushed for development, and the future plans for what sort of water supply are also indefinite.

The letter sent you by the STH expresses our stand, and it is a great disappointment to us that the Planning Commission did what it did.
Now comes another DEIR for the Valle Vista near Thornhill, and the construction starting on Skyline with water being taken from the emergency tank.

We support the Planning Departments struggles completely, but when one reads the dates on information, one must wonder if it is still applicable.

Very truly yours, May Bloss

BUT WE ALL UP HERE WANT THAT FIRE HOUSE!

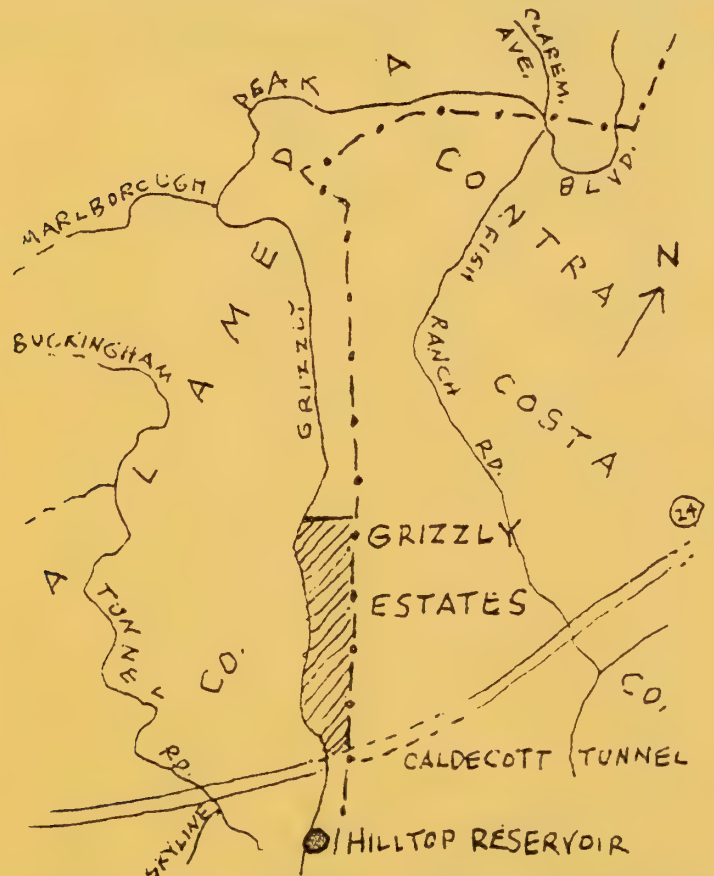
SAVE THE HILLS ASSOCIATION NEWSLETTER

7065 Marlborough
Berkeley Ca.94705
February 21,1980

Dear Hilldwellers--

WILLIE YEE HAS JUST ASKED US TO TELL YOU THAT DUE TO OVERCROWDED AGENDA, THE PUBLIC MEETING ON THE GRIZZLY ESTATES DEVELOPMENT EIR, SCHEDULED FOR FEB.27, HAS BEEN POSTPONED TO MARCH 12,SAME TIME (1:15), SAME PLACE ( Rm.115,City Hall). Ignore the date on the previous STH mailer.

As the previous mailer said, the developer of the Grizzly Estates needs water from the Hilltop emergency-temporary tank located SE of the site, off Grizzly, to build. The tank capacity is 250,000 gallons, 38,000 for domestic use; the remaining amount from this is sufficient for six connections; to supply the remaining thirteen connections 9,1000 gallons must be taken from the amount for emergency-fire use.




In the 1977 EBMUD EIR (P.12) it says that in the 1970 fire in our area (REMEMBER IT?) ca. 2.2 million gal. water was used for fire-fighting during the few hours in which 38 houses were totally destroyed and ca. 37 badly damaged. If there had not been a wind change the fire would have gone on down into the flats.

In the Grizzly Estates EIR it says (P.9) that Fire Dept. standards apply to a single dwelling, with 1500 gallons per minute for two hours ONLY. A "wildfire" such as 1970 is beyond their jurisdiction, they say. In the 1970 fire 7x the water and 2x the pressure as indicated in this standard was expended.

Oakland Tribune TODAY Feb.11, 1980 "(in an earthquake) indeed the possibility of a huge fire sweeping the Oakland-Berkeley hills. Previous fires in the hills should make it clear how difficult it is to stop a blaze in that area..... include necessity of emergency fire fighting plan."

Oakland Tribune Feb.3, 1980 "the quake would slice the EBMUD water tunnels through the E.Bay hills (Claremont Water Tunnel runs ca. along Claremont Avenue) ..... only a few hours supply west of the hills. If a big quake completely cut the tunnels, fire could sweep the E.Bay.... But if the quake was only 7.0 magnitude, some water would get through, breaking the Claremont Water Tunnel.... about 5% of normal water supply would get thru.. but because of breaks... the distribution pipes west of the hills, many areas would be without water and fires would spread ...."

Today there was another quake in Livermore.

DO NOT KID YOURSELF THAT IT CANT HAPPEN HERE! KEEP THE DATE OF THE PUBLIC MEETING ON MARCH 12 OPEN, GO DOWN AND VOICE YOUR CONCERNS ABOUT THE BEGINNING OF THE NIBBLING AWAY OF OUR EMERGENCY-TEMPORARY FIREFIGHTING WATER SUPPLY.

We are not against building, but we are against thoughtless and unplanned development in the hills that will endanger the future of our unsurpassed environment.

If you cannot go to the meeting, write: (1) EBMUD Secretary Bd.Dir.,PO# 24055, Oaklamd 94623; (2) Secretary City Council, City Hall,Oakl.94612; (3) Superv.Bort,Alameda County Court H.,1221 Oak St.,Oakl.946--: (4) Assemblyman Bates,Rm#4171, State Capital, Sacramento 95814; (5) Marc Herbert, Secty Planning Commission, City Hall, Oakland 94612; (6) Willie Yee, Thomas Doctor Planning Department, City Hall, Oakland 94612; (7) Marge Gibson, Council for our Distr., City Hall etc.; (8) John Sutter, Council, City Hall etc.

Sincerely

ed Good, Vic Cassman, Concetta Jorgensen, Olen S. Seaman Jr., May Blo

ALFRED W. BAXTER
6823 BUCKINGHAM BOULEVARD
BERKELEY, CALIFORNIA 94705

February 26, 1980

Mr. Marc Herbert, Secretary
Oakland Planning Commission
City Hall
Oakland, California

Dear Sir:

In your report to the Planning Commission regarding the views of hill residents toward the proposed Grizzly Estates Development, please add my views and Mrs. Baxter's to those who oppose the development.

We are particularly concerned with the proposed diversion of emergency fire protection water to residential uses in the light of our tragic experiences during the 1970 fire. It seems ill considered to increase the potential demand for emergency water while concurrently reducing the per house supply.

Sincerely yours,

A. W. Baxter

A. W. Baxter

AWB:em

CITIZENS FOR URBAN WILDERNESS AREAS
4325 MOUNTAIN VIEW AVE., OAKLAND, CALIFORNIA 94605



March 5, 1980

City Planning Commission
City Hall
14th and Washington Streets
Oakland, CA 94612

Dear Commission Members:

Citizens for Urban Wilderness Areas wish to express strong opposition to any use of emergency water facilities by Grizzly Estates Development. Such use could open the gates to a flood of development applications and force the establishment of a policy of very questionable value. Our opposition is based on the following:

(1) The 1970 "wildfire" which came across the hills from near Fish Ranch Road destroyed 38 homes and badly damaged nearly as many more. Any diversion to residential use of water from emergency facilities could gravely endanger many homes and lives should a similar "wildfire" occur again.

(2) As pointed out in the February 3 Oakland Tribune this year, and again in the February 11 Today, quake damage to EBMUD water lines tunneled through the hills could leave most areas west of the hills without water. A "wildfire" similar to that of 1970 could sweep even into the flat lands in such an event. In fact, a change in wind direction during the 1970 fire may have prevented even greater damage than occurred.

(3) Fire hazard often is greater during those dry seasons following above normal rain seasons because the greater growth of vegetation as a result of more rain provides more potential fuel during the dry months. The eastern slopes of the Berkeley-Oakland Hills provide much fuel in the cover of grass, chaparral, and eucalyptus in contiguous areas. They are thus a grave fire danger in dry months.

(4) In May 1977 the State Board of Forestry passed a resolution (copy enclosed) calling attention to the fire hazards of brush and chaparral and urging cities and counties in California to discourage home building in such areas of high fire hazard. CUWA believes this resolution by the State Board of Forestry should be regarded more seriously than has seemed to be evident in recent actions of EBMUD and the City of Oakland in permitting use of emergency facilities and the granting of building permits, respectively.

(5) CUWA has consistently opposed residential use of the emergency facilities since 1975 when EBMUD suggested reclassification of the emergency lines to a standard residential use.

Because of these above reasons CUWA urges that no permits be issued for any residential construction requiring use of the emergency water facilities.

Sincerely yours,

Glenn T. Seaborg
Chairman

GTS/11
Enclosure

cc: Oakland City Council Members
May Blos (Save the Hills Assoc.)
The Montclarion
Helen Burke
East Bay Municipal Utility District Directors

## POLICY ON AVOIDANCE OF ADDITIONAL RISKS IN BRUSH FIRE HAZARDOUS AREAS

WHEREAS, the chaparral and other brush areas of California that are subject to wildland fires are generally known and mapped as areas of high fire hazard; and

WHEREAS, urbanization in these chaparral and other brush-covered areas severely complicates and handicaps the ability of fire protection agencies to control the spread of wildfires in these areas while, at the same time, trying to protect values of life and property in the urbanized areas; and

WHEREAS, urbanization in these areas also drastically restricts the ability of fire protection agencies to use certain techniques, such as prescribed burning, to reduce and control the large volume of flammable vegetation intermingled with the property values; and

WHEREAS, the state's expenditure of public funds for fighting wildfires in brush-covered areas is increasing because urbanization in such areas results in a greater number of fire starts and requires more fire protection resources and more fire prevention inspections; and

WHEREAS, increased urbanization in brush-covered lands means more state involvement in structural fire protection; and

WHEREAS, urbanization can result in damage to watersheds from grading of residential and industrial sites, road building, and, consequently, from increased fire incidence; and

WHEREAS, many inexperienced people inadvertently find themselves living with an unanticipated risk of damage from wildfires to themselves and their property; and

# THE ORINDA ASSOCIATION

POST OFFICE BOX 97
ORINDA, CALIFORNIA 94563
*Telephone 254-0800*


April 9, 1980

Planning Department
City of Oakland
Oakland, California

Dear Planners:

We are pleased to have the opportunity to comment on the draft EIR for the Grizzly Peak Estates Subdivision.

Now, and in the past, The Orinda Association has been concerned with the growth inducing aspects and potential of opening up emergency water supplies to residential subdivisions.

We further are concerned with the precedential aspect of the extension of water and other services as proposed and the possibility this sort of reclassification of water supplies may occur in Orinda as well.

Finally, we note in Appendix C contemplated annexation of several Contra Costa County parcels which would be oriented to Oakland for their services and question whether this would have an effect on Orinda at a later date.

Very truly yours,

THE ORINDA ASSOCIATION PLANNING COMMITTEE

Helene T. Frakes

Helene T. Frakes
Co-Chair

HTF/bl